

**UNITED STATES DISTRICT COURT NORTH DAKOTA
WESTERN DIVISION**

Howard J. Miller, et al.) Civil Action No. 1:20-cv-00132-DMT-CRH
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)
)
Plaintiffs,)
)
v.)
)
Juárez Cartel, a/k/a Vicente Carrillo)
Fuentes Organization (a/k/a “CFO”),)
a/k/a La Línea.)
)
Defendant.)

**DECLARATION OF SAMUEL F. MITCHELL IN SUPPORT OF MILLER
PLAINTIFFS’ SUPPLEMENTAL MEMORANDUM OF LAW IN SUPPORT OF
MILLER PLAINTIFFS’ APPLICATION FOR COSTS UNDER 18 U.S.C. § 2333(a)**

I, Samuel F. Mitchell, declare as follows:

- 1) I am an attorney duly licensed to practice law before this Court. I am a member of the Colorado State Bar, and I have been admitted to this Court *pro hac vice*. I am a partner of Mitchell & Mitchell LLC (“Mitchell & Mitchell”) and co-counsel with Motley Rice LLC for the *Miller* Plaintiffs.
- 2) This Declaration is based on my personal knowledge and discussions with my partner, Steven C. Mitchell, at Mitchell & Mitchell about the matters stated herein, and I could competently testify to the same if called upon to do so.
- 3) This Declaration describes the actual costs incurred by Mitchell & Mitchell between December 5, 2019 and April 27, 2022, which amounts to \$14,166.02 in costs. All of the

Firm's costs are those that are normally billed to its fee-paying clients. All costs were recorded contemporaneously with their expenditure.

- 4) I categorized costs into three general categories: (1) Travel; (2) Court Fees; and (3) Miscellaneous (this includes supplies purchased for trial in North Dakota and a Fox Nation subscription to view a 40-minute long mini-documentary titled "Lara Logan Investigates: Mexican Mormon Massacre"). Although not included in this Declaration, Mitchell & Mitchell maintains a detailed description of each expense within these categories.

I declare that the foregoing is true and correct. Executed this 29th day of July, 2022.

By: /s/ Samuel F. Mitchell
Samuel F. Mitchell, Esq.
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